

Kyung S. Lee  
TX Bar No. 12128400  
R.J. Shannon  
TX Bar No. 24108062  
Ella A. Cornwall  
TX Bar No. 24142801  
**SHANNON & LEE LLP**  
2100 Travis-Suite 1525  
Houston, Texas 77002  
Tel: (713) 301-4751  
Email: klee@shannonleellp.com  
Email: rshannon@shannonleellp.com  
Email: ecornwall@shannonleellp.com

*Proposed Counsel for the Debtor and Debtor-In-Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

---

**In re:**

**Ennis I-45 11 ACRE, LLC,**

**Debtor.**

)  
) **Bankruptcy Case No.**  
) **25-31219-mvl11**  
)  
)  
) **Chapter 11**

---

**MOTION FOR EXPEDITED HEARING ON DEBTOR’S EMERGENCY MOTION FOR  
THE ENTRY OF AN ORDER APPROVING THE PREVIOUS USE OF CASH  
COLLATERAL FOR PAYMENT OF CERTAIN CRITICAL VENDORS**

Ennis I-45 11 ACRE, LLC (the “Debtor”), debtor and debtor-in-possession, by and through its undersigned proposed counsel, files this motion for expedited hearing for Debtor’s *Emergency Motion for the Entry of an Order Approving the Previous Use of Cash Collateral for Payment of Certain Critical* (the “Motion”)¹. In support thereof, the Debtor respectfully shows the following:

1. **Underlying Motion:** The underlying Motion requests the authorization of the Debtor’s previous use of cash collateral to pay certain critical vendors. The Debtor was authorized

---

¹ Capitalized terms used but not otherwise defined herein shall have the meaning set forth in the Motion.

by InterBank, the first lien holder, to do so and approval of \$8,348.66 was given. Of this amount \$6,278.66 was prepetition debts. In the business judgment of the debtor, the majority of the debtor's prepetition vendor claims have been paid by this authorized amount.

2. **Need for an expedited hearing:** An expedited hearing is necessary because the Debtor had an immediate need to use its Cash Collateral in order to keep its business afloat and pay its debts.

3. **Certificate of conference:** The Debtor contacted the parties listed below by email on April 14, 2025, concerning an expedited setting of the underlying motions:

- i. Meredyth Kippes, Office of the U.S. Trustee—Counsel to the U.S. Trustee.
- ii. Marc Taubenfeld, Munsch Hardt Kopf & Harr, P.C.—Counsel to InterBank
- iii. John Isbell, Law Offices of John F. Isbell LLC—Counsel to Bay Point

The U.S. Trustee and Counsel to Bay Point do not object to an expedited setting. Counsel to InterBank does object to an expedited setting.

4. **Time estimate for hearing:** The Debtor anticipates that the Motion can be dealt with within the 60 minute period requested previously, and set, on April 15, 2025 at 1:30 p.m.

5. **Deadline for when hearing is needed:** A hearing is needed on or before April 15, 2025.

6. **Date when all parties are available:** Each of the above parties will be available at the hearing on April 15, 2025 at 1:30 p.m.

WHEREFORE, the Debtor requestst that the Debtor's Motion for an Order Ratifying the Consented Use of Cash Collateral Authorizing the Debtor to Pay Certain Prepetition Claims of Critical Vendors be set on April 15, 2025, at 1:30 p.m. on this Court's docket.

Dated: April 15, 2025

Respectfully submitted:

/s/Ella A. Cornwall  
Ella A. Cornwall

Kyung S. Lee  
TX Bar No. 12128400  
R.J. Shannon  
TX Bar No. 24108062  
Ella A. Cornwall  
TX Bar No. 24142801  
2100 Travis Street, STE 1525  
Houston, TX 77002  
Email : klee@shannnonleellp.com  
Email: rshannon@shannonleellp.com  
Email : ecornwall@shannonleellp.com  
Phone: 713-301-4751  
Facsimile: 833-714-5770

*Proposed Counsel to the Debtor and  
Debtor-In-Possession*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served by the Court's CM/ECF system on all parties registered to receive such service on the date of filing.

/s/Ella A. Cornwall  
Ella A. Cornwall